

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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SEP 19 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Petition of the People of the State of)
California and the Public Utilities)
Commission of the State of California)
to Retain State Regulatory Authority)
over Intrastate Cellular Service Rates)
_____)

94-105

PR File No. 94-SP3

RESPONSE BY BAKERSFIELD CELLULAR TELEPHONE COMPANY
("BAKERSFIELD CELLULAR") TO PETITION BY
THE CALIFORNIA PUBLIC UTILITIES COMMISSION ("CPUC")
TO RETAIN STATE REGULATORY AUTHORITY
OVER INTRASTATE CELLULAR RATES

DAVID A. SIMPSON
YOUNG, VOGL, HARLICK & WILSON
425 California Street, Suite 2500
San Francisco, CA 94104
Telephone: (415) 291-1970
Attorneys for Bakersfield Cellular
Telephone Company

September 19, 1994

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I.

INTRODUCTION

The CPUC's petition under Section 332 (c) (3) under the Communications Act of 1934, as amended by the Omnibus Budget Reconciliation Act of 1993 ("Budget Act") for continued regulatory authority over rates charged by cellular carriers rests on the CPUC's contention that California rates are too high. The CPUC argues that these allegedly high rates are due to cellular carriers' improper failure to compete and/or by illegal collusion among the carriers.

Los Angeles Cellular Telephone Company ("L.A. Cellular"), Bakersfield Cellular's affiliate in California,¹ has filed concurrently herewith its own response to the CPUC's petition. Therein, L.A. Cellular demonstrates the fundamental errors of fact and law in the CPUC's petition. Bakersfield Cellular supports the positions taken by L.A. Cellular and incorporates L.A. Cellular's response herein by reference.

The CPUC's petition, and by necessity, the response of L.A. Cellular, focus primarily on the Los Angeles and Bay Area markets and thereby provide an incomplete picture of the state regulatory structure as it affects the entire California cellular market. Bakersfield Cellular, unlike the cellular operators in Los Angeles and the Bay Area, has a relatively modest market. Bakersfield Cellular's MSA (Kern County) has approximately 600,000 potential subscribers, whereas the market in Los Angeles and the Bay Area is 14.8 million and 6.3 million respectively. The demographics of Kern County are dramatically different from those of the large urban centers as well; income levels are much lower in Kern County than in the urban markets, and commuting time is substantially less. Nor is Bakersfield Cellular, unlike its urban counterparts, faced with immediate system congestion problems. As a result of these and other factors, cellular service prices in Kern County MSA have been, and remain, significantly lower than those in urban areas. Bakersfield Cellular "basic" rate is \$31/month (access) and .35/minute (peak airtime) while L.A. Cellular's and Bay Area Cellular Telephone Company's are both \$45/month (access) and .45/minute (peak airtime).

¹ Bakersfield Cellular is indirectly 100% owned by BellSouth Cellular Corp., which has an approximate 60% ownership interest in L.A. Cellular.

There are, however, two important similarities between the Kern County market and the urban markets of Los Angeles and the Bay Area. In both arenas there has been healthy competition between the facilities-based carriers, and, as a result, prices have dropped significantly and the quality and range of services have improved dramatically. Second, the single biggest stumbling block to even more vigorous competition is the CPUC's antiquated and ill-conceived rules - both formal and informal - governing the pricing of cellular service and equipment. Such rules, both as enforced by the CPUC itself and as manipulated by competitors, have effectively dampened competition and prevented Bakersfield Cellular's customers from receiving better priced cellular services and a wider range of options. Bakersfield Cellular respectfully urges the Federal Communications Commission to consider these two factors - the degree of competition and the CPUC's inhibition of same - as they relate to one of California's mid-sized cellular markets.

II.

THE CPUC'S REGULATIONS AND COMPETITORS' MANIPULATIONS THEREOF HAVE IMPAIRED COMPETITION IN KERN COUNTY.

The CPUC's petition, not surprisingly, fails to include a critical examination of the impact that its own regulatory structure has had upon competition. Set forth below are examples of the way the CPUC's regulatory policies have delayed, undermined or effectively thwarted Bakersfield Cellular's attempts to pass on significant savings to its customers.

A. The CPUC's Rules and Procedures Have Undercut Bakersfield Cellular's Attempts to Lower Rates.

- **Lower Roamer Rates Delayed Almost Five Months**

A substantial percentage of Bakersfield Cellular's subscribers travel regularly to Los Angeles where they are subject to the roamer rates charged by L. A. Cellular. These roamer rates in 1992 were \$2.00/day and \$.65/minute. Bakersfield Cellular, in response to competitive pressures resulting from the adoption of wide area rates by other companies, decided to charge those of its customers who roam in Los Angeles a flat rate which resulted in lowering prices for these subscribers. As required by the CPUC's procedures, Bakersfield Cellular filed an Advice Letter on May 21, 1993, seeking to implement these new lower rates (See Advice Letter No. 52, Exhibit A). Despite the undeniable benefits to customers, (and the projected significant losses to Bakersfield Cellular) the Commission insisted upon Bakersfield Cellular submitting a broad range of data in support of its request for lower rates (See CPUC letter of July 2, 1993, Exhibit B). The CPUC then took until October 6, 1993 to approve Bakersfield Cellular's request² (See Resolution T-15387, Exhibit C). In sum, as a direct result of the CPUC's antiquated and ill-conceived regulations, Bakersfield Cellular's customers were denied significant rate reduction for almost five months.

² The approval was explicitly temporary - a one-year "trial" - and required Bakersfield Cellular's subsequent submission of monthly and quarterly data documenting revenues associated with the rate reduction.

- **High Volume Discount Plan Weakened and Delayed**

On December 13, 1990, Bakersfield Cellular introduced a High Volume Discount Plan ("Discount Plan") which provided savings of between 5% and 15% to large users. On July 9, 1993, pursuant to Advice Letter No. 55, Bakersfield Cellular sought to extend this promotion for another 12 months (See Exhibit D). Bakersfield Cellular's facilities-based competitor, Fresno MSA, Ltd. ("Contel") - using the procedures set up by the CPUC - filed a formal protest (See Exhibit E). Contel's alleged concern was that the discount, when applied to certain of Bakersfield Cellular's rate plans, would result in rates at levels comparable to or below those available to wholesale purchasers. The CPUC, pursuant to Decision No. 90-06-025, had established a 5% minimum "spread" between wholesale and retail offerings for large users.

Contel's real concern - given that Contel is not a reseller³ and does not buy from Bakersfield Cellular's wholesale tariff - is that Contel simply did not want Bakersfield Cellular to offer rates substantially lower than those Contel was offering. However, because of the Contel protest and the CPUC's staff support thereof, Bakersfield Cellular faced a Hobson's choice: either withdraw the Advice Letter, and thus provide no further discounts for any of its rate plans, or amend the Advice Letter to limit its applicability to certain rate plans. On the belief that half a loaf was better than none, Bakersfield Cellular chose to amend the Discount Plan through the filing

³ There is virtually no reseller presence in its market; the one exception is Motorola which has maintained just a handful of numbers on Bakersfield Cellular's system over the years. Motorola did not protest the Discount Plan; indeed Motorola has never protested any Bakersfield Cellular filing.

of Advice Letter No. 55-A on October 14, 1993, which was not effective until November 13, 1993 (See Exhibit F). The net result is the Discount Plan did not go as far as Bakersfield Cellular would have wished, and there was a four month delay between the filing of the Advice Letter extending the promotion and the effective date of the modified Discount Plan. Again, customers were denied significant savings on some plans and forced to wait unnecessarily for savings on other plans.

- **Multi-Line Plan Delayed**

Bakersfield Cellular, in an effort to make it easier for consumers to group together and have access to multi-line plans which provide significant discounts off the "basic" rate, revised its Multi-Line Plan. This revised plan, unlike multi-line plans available to large corporations, did not include a requirement that the individual users be employed by a common company or have a similar legal relationship. All that was required was an affiliation with a common entity. In this way, members of professional associations or similar organizations would qualify for the discounts.

The revised Multi-Line-Plan was filed on February 10, 1994 (See Advice Letter No. 71, Exhibit G) and was protested, again not by customers or even resellers, but by Bakersfield Cellular's competitor Contel (See Exhibit H). Bakersfield Cellular responded to the March 2, 1994 protest on March 14, 1994 (See Exhibit I), but two months elapsed before the CPUC issued its opinion on the matter. In a letter dated May 3, 1994 (See Exhibit J), the CPUC dismissed Contel's protest but demanded that Bakersfield amend its offering to require that a single subscriber guarantee payment in full for all of the lines. Bakersfield Cellular, by letter of May 26, 1994 (See Exhibit K), challenged this ruling on the obvious grounds that it punishes ratepayers (by

making the discounts less accessible) in the interest of protecting a single competitor - Contel - which wants to prevent prices from falling. The CPUC has yet to respond.

B. The Commission's Prohibition Against Bundling Cellular Service and Equipment Props Up Prices and Has Been Used as an Anti-Competitive Device.

As this Commission is no doubt aware, the CPUC is the only State regulatory commission in the nation which continues to prohibit cellular providers from conditioning the sale of equipment - at lower than standard prices - upon the purchase of cellular service. This "anti-bundling" rule is supported and manipulated by competitors to protect their narrow interests, while keeping California consumers from enjoying lower prices.

On December 17, 1993, at the onset of the peak Christmas sales season, Contel sued Bakersfield Cellular and its largest agent in Superior Court on the grounds that Bakersfield was violating the CPUC's anti-bundling policy (Kern County Superior Court, Case No. 224963-AEW). Contel sought restraining orders against Bakersfield Cellular, the net effect of which would have been to ruin sales during this critical period. At very great expense, both in terms of legal fees incurred and management time diverted, Bakersfield Cellular succeeded in having Contel's lawsuit dismissed.⁴

Bakersfield Cellular, in recognition of the strong anti-consumer effect of the Commission's anti-bundling rule, petitioned on July 9, 1993 to have the rule

⁴ Contel's use of a civil lawsuit was in keeping with Contel's historical pattern of trying to use the anti-bundling rule to stifle competition. Contel has called and written letters to the CPUC's staff wherein Contel alleges bundling by Bakersfield Cellular. While the Commission has resisted Contel's requests to initiate formal proceedings against Bakersfield Cellular, the company has none-the-less had to expend significant amounts of time and money responding to these anti-competitive strategies.

rescinded. The CPUC has not only failed to grant Bakersfield's petition, the CPUC required a long and expensive evidentiary hearing process which has not yet resulted in a decision. Once again, the main opposition to Bakersfield Cellular's petition comes not from individual customers, who would obviously benefit, but from competitors, including Nextel, the California resellers' association and an association of agents who engage in equipment sales, all of whom are seeking merely to protect their own narrow interests. These entities have used every procedural avenue available under CPUC's rules to delay or derail Bakersfield Cellular's petition. So far, the forces of delay have been successful; more than fourteen months have elapsed since Bakersfield Cellular filed its petition. In the meantime, California consumers continue to pay prices far higher than those paid by consumers in all other 49 states.

III.

DESPITE THE CPUC'S RULES, THERE HAS BEEN HEALTHY COMPETITION IN THE KERN COUNTY MARKET WHICH HAS RESULTED IN BETTER SERVICE AT LOWER PRICES

Bakersfield Cellular respectfully suggests that the CPUC's fundamental conclusions - that California consumers are paying too much for cellular service and that competition is not sufficiently robust - are patently unsupported by the facts. As set out below, any balanced review of the relevant indices in Kern County MSA shows that prices have fallen, service has improved and competition, in spite of the CPUC's arcane regulatory structure, is healthy.

A. Consumers Are Now Paying Substantially Less For Cellular Service Than They Were When Service Was Initiated.

As noted above, Bakersfield Cellular's initial rates, as approved by the CPUC (Decision No. 88-05-024) were \$31/month access, and \$.35/minute peak, \$.20/minute off peak. This "basic" plan - reflecting relatively weaker market conditions than those extant in the large urban centers - was 25% below comparable basic rates of L.A. Cellular and Bay Area Cellular Telephone Company.⁵

While it is true that the "basic" rate has not fallen at all since it became effective in 1988, this fact is almost irrelevant, notwithstanding the CPUC's fixation therewith. The meaningful rates are those which are actually being paid by consumers, not rate plans which are largely unused. Fully 67% of Bakersfield Cellular's customer base is on alternative, lower cost plans, and fewer than one new customer in four currently takes service on the "basic" plan.

The results of these alternative plans have been dramatic. In 1989, the average subscriber paid \$31.00 per month for access; the average subscriber now pays \$24.55 per month, a net decrease of 21%. When adjusted for inflation⁶, the decrease is 36%. Similarly, subscriber payments for average per minute airtime have fallen from \$.32/minute to \$.285/minute, a decrease of 11% or 28.4% when adjusted for inflation. To insist, as does the CPUC, that rates are "stuck" at high levels, is simply to ignore the facts.

⁵ This is based on a typical Bakersfield Cellular subscriber using 120 minutes per month, of which 75% is peak.

⁶The inflation calculations are based on the Bureau of Labor Statistics, Consumer Price Index, All Urban Consumers. From 1989 through July, 1994, this index shows cumulative inflation of 19.5%.

B. While Rates Have Fallen, The Quality And Scope Of Services Have Improved And The Customer Base Has Expanded.

When Bakersfield Cellular initiated service in 1988, it had five cell sites which effectively covered less than 40% of Kern County. Bakersfield Cellular has since made a cumulative investment in plant of more than \$12 million and has constructed an additional eight cell sites. As a result, the company's system now provides service throughout a 4,500 square mile area, or roughly 76% of Kern County.

In addition to this dramatic increase in calling area, customers have also benefitted from a variety of other service improvements. Thus, for example, customers who were once limited to a single rate plan, now can choose from among more than a dozen to find the one best suited to their particular needs. For example, there are special plans for low users, for associations with multiple lines and for individuals with high usage patterns. The company has introduced a billing and collection service to help its multi-line accounts keep better track of usage and has recently initiated a data-only service in response to consumer demand.

The company has also, both on its own initiative and in response to competitive pressure from Contel, has introduced or extended more than 50 special promotions or rate discounts since 1988. The promotions have included relatively modest offerings, such as waiver of activation fees, to spectacular benefits, such as unlimited weekend service at no cost.

The company's introduction of a wider range of services, combined with lower prices, has lead to a substantial increase in customers. In 1989, there were, on average, approximately 2,000 subscribers; by 1994 this had increased roughly ten fold. Lower prices have also brought a dramatic decrease in Bakersfield Cellular's per

subscriber revenue. In 1989, revenue was nearly \$99.00 per subscriber, per month; this has fallen to roughly \$59.00 per subscriber, per month, a decrease of 40%, or 52% when adjusted for inflation.

From all vantage points, the picture which emerges from a dispassionate analysis is not consistent with the gloomy portrait painted by the CPUC. Contrary to the CPUC's implication that carriers are colluding to prop up prices at ratepayer expense, the record reflects the opposite: prices have fallen, the quality and range of services have improved markedly and new customers are flocking to initiate service. The simple, and indeed only reasonable conclusion to draw from these facts, is that competition is healthy in the Kern County MSA.

IV.

CONCLUSION

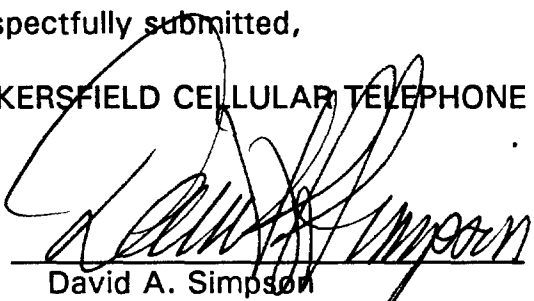
For the reasons set forth above, the public interest would be disserved by continued CPUC regulation over cellular rates. Wherefore, Bakersfield Cellular urges this Commission to deny the CPUC's Petition.

September 19, 1994.

Respectfully submitted,

BAKERSFIELD CELLULAR TELEPHONE COMPANY

By:


David A. Simpson

YOUNG, VOGL, HARLICK & WILSON
425 California Street, Suite 2500
San Francisco, CA 94104
Telephone: (415) 291-1970

Its Attorneys

U-3017-C

BAKERSFIELD CELLULAR TELEPHONE COMPANY
4180 TRUXTUN AVENUE
BAKERSFIELD, CALIFORNIA 93309

ADVICE LETTER NO. 52

May 20, 1993

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Bakersfield Cellular Telephone Company ("Utility") hereby submits the original and five copies of the following tariff sheets relating to its cellular radiotelephone service:

<u>New CPUC Sheet No.</u>	<u>Cancelling CPUC Sheet No.</u>
3-T 27th Revised Sheet No. 1	3-T 26th Revised Sheet No. 1
3-T 10th Revised Sheet No. 2	3-T 9th Revised Sheet No. 2
3-T Original Sheet No. 18	N/A
4-T 20th Revised Sheet No. 1	4-T 19th Revised Sheet No. 1
4-T 1st Revised Sheet No. 12	4-T Original Revised Sheet No. 12

This Advice Letter is filed for the purpose of introducing a special roaming rate for Utility's customers who roam in the Los Angeles Cellular Geographic Service Area.

Utility requests that the tariff changes submitted herewith be made effective pursuant to General Order 96-A. Copies of this Advice Letter and related tariff sheets are being mailed to all competing and adjacent utilities and to other interested parties having requested such information.

EXHIBIT A

Anyone may protest this Advice Letter to the California Public Utilities Commission ("Commission"). The protest must set forth the specific grounds on which it is based, including such items as financial and service impact. A protest must be made in writing and received within 20 days of the date this Advice Letter was filed with the Commission. The address for mailing and delivering a protest to the Commission is:

Chief, CACD Telecommunications Branch
California Public Utilities Commission
505 Van Ness Avenue, Room 3203
San Francisco, California 94102

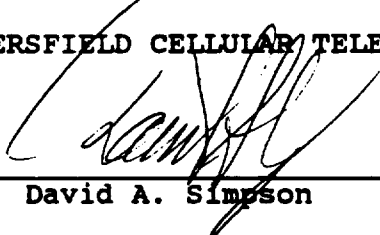
A copy must be mailed to the undersigned Utility on the same date it is mailed or deliver to the Commission.

After filing these tariff sheets, please provide this office with a file-stamped copy of this Advice Letter (an extra copy has been enclosed), with accompanying tariff sheets, in the enclosed self-addressed stamped envelope.

Respectfully submitted,

BAKERSFIELD CELLULAR TELEPHONE COMPANY

By



David A. Simpson

DINKELSPIEL, DONOVAN & REDER
One Embarcadero Center, 27th Floor
San Francisco, CA 94111
Telephone: (415) 788-1100

Its Attorneys

BAKERSFIELD CELLULAR TELEPHONE COMPANY
4180 Truxtun Avenue
Bakersfield, California 93309

Schedule Cal.P.U.C. No. 3-T
27th Revised Sheet No. 1
Cancelling 26th Revised Sheet No. 1

CELLULAR RADIO TELECOMMUNICATIONS SERVICE (RETAIL)

LIST OF EFFECTIVE SHEETS

<u>Sheet</u>	<u>Number of Revision</u>	
Title	Original	
1	27th Revised	(T)
2	10th Revised	(T)
3	3rd Revised	
4	2nd Revised	
5	3rd Revised	
5.1	Original	
5.2	Original	
5.3	1st Revised	
5.4	2nd Revised	
6	1st Revised	
7	4th Revised	
8	5th Revised	
9	4th Revised	
10	2nd Revised	
11	2nd Revised	
12	Original	
13	1st Revised	
14	6th Revised	
15	2nd Revised	
16	Original	
17	Original	
18	Original	(N)

Advice Letter No. <u>52</u>	Issued by <u>Brian Ducharme</u>	Date Filed <u> </u>
Decision No. <u> </u>	NAME <u> </u>	Effective <u> </u>
	General Manager <u> </u>	Resolution No. <u> </u>
	TITLE <u> </u>	

BAKERSFIELD CELLULAR TELEPHONE COMPANY
4180 Truxtun Avenue
Bakersfield, California 93309

Schedule Cal.P.U.C. No. 3-T
10th Revised Sheet No. 2
Cancelling 9th Revised Sheet No. 2

CELLULAR RADIO TELECOMMUNICATIONS SERVICE (RETAIL)

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Title	Title Page
1	List of Effective Sheets
2	Table of Contents
3	Applicability
3	Territory
3-5.4	Rates - Retail
6-18	Special Conditions (T)

Issued by

Advice Letter No. 52

Brian Ducharme

Date Filed _____

Decision No. _____

NAME

Effective _____

General Manager

TITLE

Resolution No. _____

CELLULAR RADIO TELECOMMUNICATIONS SERVICE (RETAIL)

(Continued)

SPECIAL CONDITIONS - RETAIL (Continued)

Q. Los Angeles CGSA Roaming

Utility customers who roam in the Los Angeles Cellular Geographic Service Area (LACGSA) will be charged a flat rate (peak and off peak) of 79 cents per minute for cellular airtime usage incurred in the LACGSA. All other applicable charges, including long distance fees, will be assessed in accordance with Utility's applicable tariffs.

(N)

(N)

Issued by

Advice Letter No. 52

Date Filed _____

Brian Ducharme

Decision No. _____

NAME

Effective _____

General Manager

TITLE

Resolution No. _____

BAKERSFIELD CELLULAR TELEPHONE COMPANY
4180 Truxtun Avenue
Bakersfield, California 93309

Schedule Cal.P.U.C. No. 4-T
20th Revised Sheet No. 1
Cancelling 19th Revised Sheet No. 1

CELLULAR RADIO TELECOMMUNICATIONS SERVICE (WHOLESALE)

LIST OF EFFECTIVE SHEETS

<u>Sheet</u>	<u>Number of Revision</u>	
Title	1st Revised	
1	20th Revised	(T)
2	4th Revised	
3	3rd Revised	
4	1st Revised	
4.1	Original	
4.2	Original	
4.3	2nd Revised	
5	Original	
6	Original	
7	1st Revised	
8	6th Revised	
9	4th Revised	
10	3rd Revised	
11	Original	
12	1st Revised	(T)

Issued by

Advice Letter No. 52

Date Filed _____

Brian Ducharme

Decision No. _____

NAME

Effective _____

General Manager

TITLE

Resolution No. _____

CELLULAR RADIO TELECOMMUNICATIONS SERVICE
(Continued)

SPECIAL CONDITIONS - WHOLESALE (Continued)

M. One Month Free Offer

1. Eligibility

This One-Month-Free Offer is available to any reseller who (1) currently maintains an existing access number or activates a new access number between the effective date of this advice letter and June 30, 1993, and (2) the relevant access number is not eligible for any other promotion currently offered. A new access number is one that: (1) has not been activated on the Company's cellular system prior to the effective date of this advice letter; or (2) had been activated on the Company's cellular system and subsequently terminated ninety (90) days or more prior to the effective date of this advice letter.

2. Offer

The reseller will receive a credit of \$75.00 for each eligible access number (as described above) which was activated between the effective date of this advice letter and June 30, 1993.

N. Los Angeles CGSA Roaming

Resellers whose end users roam in the Los Angeles Cellular Geographic Service Area ("LACGSA") will be charged a flat rate (peak and off-peak) of 67 cents per minute for a cellular airtime usage incurred by such end-users on the LACGSA. All other applicable charges, including long distance fees, will be assessed in accordance with Utility's tariffs.

(N)

(N)

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Issued by

Advice Letter No. 52

Date Filed _____

Decision No. _____

Brian Ducharme

NAME

Effective _____

General Manager

TITLE

Resolution No. _____

R.W. SCHULTHEIS
MISSION TELECOMMUNICATIONS CORP.
P.O. BOX 6636
LAGUNA NIGUEL, CA 92707-6636

SALINAS CELLULAR TELEPHONE CO.
851 DEL MONTE AVENUE
MONTEREY, CA 93940

THE PHONE COMPANY FRANCHISING CORP.
1669 OLD BAYSHORE HIGHWAY
BURLINGAME, CA 94010
ATTN: RON ROSBERG

CELLULAR ONE
104 COMMERCE COURT, SUITE D
CORDELIA, CA 94585
ATTN: WANDA COOKE

WAYNE B. COOPER, ESQ.
FARRAND, COOPER & BRUINIERS
POST OFFICE BOX 7329
SAN FRANCISCO, CA 94120

SANTA CRUZ CELLULAR TELE. CO.
3949 RESEARCH PARK CT., STE. 100
SQUEL, CA 95073
ATTN: AL RODRIGUES

SANTA BARBARA CELLULAR
6485 CALLE REAL, SUITE E
GOLETA, CA 93117

REDWOOD CELLULAR COMMUNICATIONS
1184 YULUPA AVENUE
SANTA ROSA, CA 95405

MOBILPHONE CORPORATION
317 W. 7TH STREET
EUREKA, CA 95501
ATTN: BEN HOOVER

PRIME CELLULAR
P.O. BOX 277
AGOURA HILLS, CA 91301
ATTN: KEVIN HAMILTON

ROBERT J. GLOISTEIN, ESQ.
ORRICK, HERRINGTON & SUTCLIFFE
400 SANSOME STREET
SAN FRANCISCO, CA 94111

MATRIX CELLULAR RESOURCES
3628 FOOTHILL BLVD.
GLENDALE, CA 91214

ULTRATELECOM, INC.
10846 WASHINGTON BLVD.
CULVER CITY, CA 90232-3610
ATTN: JORGE L. SERRON

DIGITAL COMM. NETWORK
3396 WILLOW LANE SUITE 200
WESTLAKE VILLAGE CA 91361
ATTN: MARGRIT DORGELO

FRESNO CELLULAR TEL. CO.
5260 NO. PALM AVENUE, #120
FRESNO, CA 93710

GTE MOBILNET INC.
10 ROSEWOOD DR., 2ND FLR.
SANTON, CA 94588
A: SCHELLY K. JENSEN

CELLUPHONE
6681 E. 26TH STREET
LOS ANGELES, CA 90040
ATTN: MITCHELL MOHR

MOTOROLA CELLULAR SERVICE, INC.
600 NORTH U.S. HIGHWAY 45
ROOM A-6245
LIBERTYVILLE, IL 60048-1286
ATTN: CARL M. ANDERSON

MY STORE, INC.
1971 NORTH TUSTIN
ORANGE, CA 92665

NATIONWIDE CELLULAR SERV.
20 EAST SUNRISE HIGHWAY
VALLEY STREAM, NY 11581-1252

WILLIAM G. IRVING, ESQ.
COUNTY OF LOS ANGELES
9150 E. IMPERIAL HIGHWAY
DOWNEY, CA 90242

CAL-ONE CELLULAR
P.O. BOX 627
FORT JONES, CA 96032-0627
ATTN: JAMES HENDRICKS

JAMAL FAKORY
CELLULAR PACIFIC
1166 BROADWAY, SUITE L
PLACERVILLE, CA 95667

MORLEY MENDELSON, ESQ.
C/O MESERVE, HUMPER & HUGHES
333 SO. HOPE STREET, SUITE 3500
LOS ANGELES, CA 90017

CALIFORNIA REAL ESTATE CELLULAR SERVICE
CORPORATION
1451 FRUITDALE AVENUE
SAN JOSE, CA 95161-0790

DELTA TELECOM MOBILE
SERVICE, INC.
8050 EAST FLORENCE, STE. 11
DOWNEY, CALIFORNIA 90240
ATTN: MARK KAHLER

PACTEL CELLULAR
5075 SHOREHAM PLACE, STE. 100
SAN DIEGO, CA 92122
ATTN: SCOTT HOGANSON

CONTEL CELLULAR OF
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